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November 17, 2021

VIA ECF

The Honorable Victor Marrero
United States District Court Judge
United States District Court
500 Pearl Street, Suite 1610
New York, New York 10007

Re: Nwosuocha v. Glover, et al. (Civ. Action No. 21-cv-04047)

Dear Judge Marrero:

We are the attorneys for Defendant Donald McKinley Glover, II in the above-referenced action, and are in the process of becoming counsel of record for all but one of the defendants, namely, Roc Nation Publishing LLC, which is represented by Quinn Emanuel.

We respectfully request that your Honor “so order” the accompanying stipulation entered into between Plaintiff and Defendants, which establishes December 22, 2021, as the single response date for all Defendants to respond to the Complaint.

The first stipulation that your Honor “so ordered” established December 8, 2021 as the single response date for all but one defendant, namely, Jeffery Lamar Williams, who had not yet been served. Because of the delays involved in working out the details of voluntary service of process upon Mr. Williams, and the engagement of the Davis firm by the identified Defendants, the further two-week extension is necessary.

As provided in the parties’ accompanying stipulation, Mr. Williams will not contest service of process in exchange for establishing December 22, 2021, as the single date by which Defendants will respond to the Complaint.

Plaintiff acknowledges that he will save considerable time and expense by this stipulation. The parties have not entered into the stipulation to delay the action or for any improper purpose.

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We thank the Court in advance for its consideration of this letter and stipulation.

Respectfully submitted,

/s/ Jonathan D. Davis

Jonathan D. Davis

JDD:hs
Attachment

cc: Imran H. Ansari, Esq. (Via ECF)
Allen Grodsky, Esq. (Via Email)
Alex Spiro, Esq. (Via ECF)
Paul Brian Maslo, Esq. (Via ECF)